

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Lynchburg Division**

In re: A.G. DILLARD, INC., DEBTOR	CASE NO. 22-60155 (RBC) CHAPTER: 11
BREEDEN CONSTRUCTION, LLC MOVANT, v. A.G. DILLARD, INC., RESPONDENT)	

**MOVANT'S CERTIFICATION REQUIRED WITH
RESPECT TO MOTION FOR RELIEF FROM STAY**

1. Description of Property: Contract rights to draws and retainage.
2. Copies of Security Instruments: Ex. A Berkmar Landing Apartments Subcontract
Ex. B Presidio Apartments Subcontract
3. Statement of Amount Due:
 - (a) Unpaid Principal: N/A
 - (b) Accrued Interest from a specific date to a specific date: N/A
 - (c) Late Charges from a specific date to a specific date: N/A
 - (d) Attorney's fees: \$22,668.86.
 - (e) Advances for Taxes, Insurance, and the Like: N/A
 - (f) Unearned Interest: N/A
 - (g) Any Other Charges:

Charge	Project	Amount
Unpaid Subcontractors	Berkmar	468,990.24
	Presidio	1,073,728.23
Estimated Cost to Complete	Berkmar	1,139,767.60
	Presidio	2,962,661.75

- (h) Dates of missed contractual payments as of date of Motion for Relief: N/A.
4. A Per Diem Interest Factor: N/A
5. Movant's valuation of property:

Contract Right	Project	Amount
Retainage	Berkmar	486,483.10
Retainage	Presidio	516,344.10
Withheld draws	Presidio	353,092.72

Basis of such valuation: contract rights to date.

A summary of each contract status, including withheld draws, retainage, unpaid subcontractors of the debtor, and estimated costs to complete as of 3/10/2022 is attached as Exhibit C.

I HEREBY CERTIFY, as a Member of the Bar of the Court, that I represent the above-named Movant(s) and that the information contained herein is true according to the best of my knowledge and belief.

DATED: 3/10/2022

/s/ Paul A. Driscoll
Signature of Movant's Attorney

*** ALL BLANKS MUST BE COMPLETED
IF THE ANSWER IS NONE OR NOT
APPLICABLE, PLEASE SO STATE.